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September 16, 2021

The Honorable Cathy L. Waldor, U.S.M.J. United States District Court Clerk Martin Luther King Building & U.S. Courthouse 50 Walnut Street Newark, New Jersey 07101

Re: BRG Harrison Lofts Urban Renewal LLC v. General Electric Co., et al.

(Consolidated w/ Evanston Ins. Co. v. Accredited Environmental

Technologies, Inc., et al.)
Docket No. 2:16-cv-06577

Dear Judge Waldor:

We represent Plaintiff, Evanston Insurance Company ("Evanston") in the insurance coverage portion of these consolidated actions.

We write to advise that Evanston has produced the relevant claims file documents and that counsel for Defendant, Environmental Waste Management Associate, LLC has consented to withdrawing the request for a pre-motion conference set forth in their September 9, 2021 letter to Your Honor.

Respectfully submitted,

RIVKIN RADLER LLP

Michael J. Jones

Michael J. Jones

MJJ/dh

cc: All Counsel of Record (via ECF)